

CHAPTER 7. REASSESSMENT

Key Points

- The Regional Water Board is likely to reassess the Scott River TMDL Action Plan every three years during the Basin Planning Triennial Review process.
- Regional Board staff will report to the Board at least yearly on status and progress.
- Actions relying on encouragement will be evaluated for effectiveness no more than 5 years after approval of the TMDL.
- The Regional Water Board will conduct a more extensive and focused reassessment after the Scott River TMDL Action Plan has been in effect for ten years, or sooner, if the Regional Water Board determines it necessary..

This chapter describes the process the Regional Water Board will take to review, reassess, and possibly revise the TMDL Action Plan for the Scott River watershed.

The Regional Water Board is likely to reassess the TMDL Action Plan every three years during the Basin Planning Triennial Review process. Regional Board staff will prepare a yearly workplan describing key goals and activities with respect to the Action Plan. Regional Board staff will report to the Regional Board at least yearly on the status and progress of implementation activities. For activities that rely on encouragement as a first step, a formal assessment of proven or expected effectiveness of these efforts will be completed within 5 years from the date of U.S. EPA approval. An extensive and focused reassessment will occur after the TMDL Action Plan has been in effect for ten years. If the Regional Water Board determines it to be necessary, reassessment will occur before ten years has passed.

During the reassessments, the Regional Water Board is likely to consider the effectiveness of the TMDL Action Plan at meeting the sediment and temperature TMDLs, achieving sediment and temperature water quality objectives, and protecting the beneficial uses of the Scott River watershed. In order to help determine the effectiveness of the TMDL Action Plan, the Regional Water Board and staff will ask a series of questions. These questions are listed below in Table 7.1, along with possible approaches to answering the questions, and steps to take if revision is found to be necessary.

Although the Regional Water Board and staff will attempt to answer the questions listed in Table 7.1 while conducting the reassessments, it is important to note that the questions and possible revisions are not requirements of the Regional Water Board. It may not be feasible to fully assess the TMDL Action Plan due to limited resources or data. For example, the amount of time and funding required to conduct a new sediment or temperature source analysis may not be available during reassessment.

Table 7.1
Reassessment Considerations

Topic	Questions to Ask During Reassessment	How to Answer the Question	Steps to Take if Revision is Necessary
Attainment of Objectives	Are sediment and temperature water quality objectives still not being met? Are the beneficial uses associated with the cold water salmonid fishery still negatively impacted by excessive sedimentation and high water temperatures? Are sediment waste discharges and elevated water temperatures still the cause of the reduction in quality and quantity of instream habitat capable of supporting salmonids and other beneficial uses? Are there other beneficial uses adversely affected by excess sedimentation and high water temperatures?	Review compliance and trend monitoring data, and any other valid, instream water quality and salmonid data. Review scientific research, data, and literature published since 2005.	<p>If the answers are all no, the Scott River may be considered high quality waters. Delisting the River from the 303(d) List will likely be appropriate. Consider amending the Basin Plan to revise, lessen, and perhaps eliminate sediment and temperature control requirements. Consider amending the Basin Plan to relax sediment and temperature control requirements.</p> <p>If any answer is yes, consider amending the Basin Plan to increase and tighten sediment and temperature control requirements. Consider requiring Erosion Control Plans and/or Grazing and Riparian Management Plans from more dischargers.</p>
Attainment of TMDLs	Are the TMDLs still not being attained?	Calculate the current sediment load. Calculate the current effective shade.	<p>If the answer is no, staff should consider attainment of water quality objectives. See above.</p> <p>If any answer is yes, consider amending the Basin Plan to increase and tighten sediment and temperature control requirements. Consider requiring Erosion Control Plans and/or Grazing and Riparian Management Plans from more dischargers.</p>
Desired Conditions	Are the desired conditions no longer appropriate? Are there any parameters that should be added, revised, or removed?	Review scientific research, data, and literature published since 2005.	If the answer is yes, consider amending the Basin Plan to update the desired conditions.
Desired Conditions	Are the monitoring and sampling requirements still accurate and understandable?	Review scientific research, data, and literature published since 2005. Consider monitoring experiences.	If the answer is no, consider developing a monitoring and sampling guidance document that is separate but supplemental to the TMDL Action Plan.
Sediment Source Analysis	Are the sources identified in the Sediment Source Analysis still accurate?	Review Erosion Control Plans, timber harvest plans, Grazing and Riparian Management Plans, Memoranda of Understanding, and waste discharge requirements. Review scientific research, data, and literature published since 2005. Conduct a new sediment source analysis.	If the answer is no, consider amending the Basin Plan to update the sediment source analysis. Consider revising the TMDL and load allocations.

Topic	Questions to Ask During Reassessment	How to Answer the Question	Steps to Take if Revision is Necessary
Temperature Source Analysis	Are the sources identified in the Temperature Source Analysis still accurate?	Review timber harvest plans, Grazing and Riparian Management Plans, Memoranda of Understanding, and waste discharge requirements. Review scientific research, data, and literature published since 2005. Conduct a new temperature source analysis.	If the answer is no, consider amending the Basin Plan to update the temperature source analysis. Consider revising the TMDL and load allocations.
TMDL	Are the TMDLs accurate?	Review scientific research, data, and literature published since 2005. Conduct new source analyses.	If the answer is no, consider amending the Basin Plan to update the TMDL(s). Consider revising the load allocations.
Load Allocations	Are the load allocations accurate?	Review scientific research, data, and literature published since 2005. Conduct new source analyses and rework the TMDL calculations.	If the answer is no, consider amending the Basin Plan to update the load allocations.
Implementation	Are the requirements clear and easily understandable by the regulated dischargers?	Consult with dischargers. Consult with other agencies involved with the TMDL Action Plan.	If the answer is no, consider developing a guidance document. Consider amending the Basin Plan to revise unclear or confusing language.
Implementation – Water Temperature	Are sources of elevated water temperatures effectively being prevented, minimized, and controlled?	Review Grazing and Riparian Management Plans, timber harvest plans, waste discharge requirements, and monitoring data.	If the answer is no, consider requiring more landowners/dischargers develop and implement Riparian and Grazing Management Plans. Consider increasing the number of waste discharge requirements and/or enforcement actions on activities that remove shade-producing vegetation. Consider amending the Basin Plan to add a prohibition against the remove and/or suppression of vegetation that provides shade to a water body in the Scott River watershed.
Implementation – Sediment Discharges	Are existing sediment waste discharges effectively being prevented, minimized, and controlled?	Review Erosion Control Plans and instream monitoring data.	If the answer is no, consider requiring more landowners/dischargers develop and implement Erosion Control Plans. Consider amending the Basin Plan to increase and tighten sediment control requirements.
Implementation – Grazing Activities	Are sediment waste discharges and elevated water temperatures caused by grazing activities being prevent, minimized, and controlled?	Review Grazing and Riparian Management Plans and instream monitoring data.	If the answer is no, consider requiring more landowners/dischargers develop and implement Grazing and Riparian Management Plans. Consider amending the Basin Plan to increase grazing related implementation actions.
Implementation – Flood Control & Bank Stabilization	Are dredge, fill, and bank stabilization projects causing elevated water temperatures?	Review 401 Certification permits issued since 2005. Review instream monitoring data.	If the answer is yes, consider waste discharge requirements for such activities.

Topic	Questions to Ask During Reassessment	How to Answer the Question	Steps to Take if Revision is Necessary
Implementation – Scott River Watershed Council	Have the strategic actions described in the Strategic Action Plan (SRWC, 2004) been effective at preventing, minimizing, and controlling sediment waste discharges and elevated water temperatures?	Review the SRWC’s effectiveness monitoring data. Review available compliance and trend monitoring data. Conduct sediment and temperature source analyses.	If the answer is no, consider revising strategic actions. Consider requiring landowners/dischargers to implement appropriate sediment and temperature control practices.
Implementation – Water Use	Has the County of Siskiyou developed a study plan to study the connection between groundwater and surface water, the impacts of groundwater use on surface flow and beneficial uses, and the impacts of groundwater levels on the health of riparian vegetation in the Scott River watershed? Has the study been conducted, or is it being conducted?	Consult with the County of Siskiyou and other appropriate stakeholders.	If the answer is no, discuss delays with the County of Siskiyou and attempt to remedy any problems. Consider requesting the State Water Resources Control Board to develop the study plan and/or conduct the study.
Monitoring	Is there enough information available to determine if sediment waste discharges and sources of elevated water temperatures are being controlled?	Review submitted and available monitoring data.	If the answer is no, consider requiring more monitoring and the submission of monitoring reports and data.
Monitoring - Upslope & Instream Effectiveness	Is there enough information available to determine if sediment and temperature control practices are effective?	Review submitted and available monitoring data associated with upslope and instream effectiveness monitoring.	If the answer is no, consider requiring more effectiveness monitoring and the submission of monitoring reports and data.
Monitoring - Compliance & Trend	Is there enough information available to determine if the quality and quantity of instream salmonid habitat is improving?	Review submitted and available monitoring data associated with instream effectiveness monitoring and compliance and trend monitoring.	If the answer is no, consider requiring more compliance and trend monitoring and the submission of monitoring reports and data. Consider funding more monitoring stations.